

League of United Latin American Citizens –  
Richmond Region Council 4614, et al.,

V.

## Defendants.

Civil Action No. 1:18-cv-00423-LO-IDD

I, Nicole M. Cleminshaw, state and declare as follows:

1. I am over 18 years of age. I am counsel for Plaintiffs League of United Latin American Citizens – Richmond Region Council 4614, Eliud Bonilla, Luciania Freeman, and Abby Jo Gearhart (collectively, “Plaintiffs”) in this matter and have personal knowledge of the facts stated herein. I make this declaration for the purposes of transmitting certain documents to the Court in support of the Parties’ Joint Motion to Selectively Seal Previously Filed Exhibits.<sup>1</sup>

Each of the exhibits set forth in this declaration correspond to an exhibit that was inadvertently filed in an unredacted form. Should the Parties' joint motion be granted, these exhibits—which contain appropriate redactions—can serve as replacement records for the inadvertently filed exhibits already on the docket.

2. Attached as Exhibit A is a true and correct copy of ECF No. 130, Exhibit 1 redacted for personal identifiers and information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).
3. Attached as Exhibit B is a true and correct copy of ECF No. 130, Exhibit 2 redacted for personal identifiers.
4. Attached as Exhibit C is a true and correct copy of ECF No. 185, Exhibit 2 redacted for personal identifiers and information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).
5. Attached as Exhibit D is a true and correct copy of ECF No. 185, Exhibit 3 redacted for personal identifiers and information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).
6. Attached as Exhibit E is a true and correct copy of ECF No. 185, Exhibit 4 redacted for information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).
7. Attached as Exhibit F is a true and correct copy of ECF No. 194, Exhibit 9 redacted for personal identifiers.
8. Attached as Exhibit G is a true and correct copy of ECF No. 195, Exhibit 9 redacted for personal identifiers.
9. Attached as Exhibit H is a true and correct copy of ECF No. 200, Exhibit 4 redacted for personal identifiers and information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).

10. Attached as Exhibit I is a true and correct copy of ECF No. 204, Exhibit 5 redacted for personal identifiers and information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).
11. Attached as Exhibit J is a true and correct copy of ECF No. 204, Exhibit 6 redacted for personal identifiers.
12. Attached as Exhibit K is a true and correct copy of ECF No. 204, Exhibit 9 redacted for personal identifiers and information designated as Confidential pursuant to the Protective Order in this case (ECF No. 111).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on July 15, 2019, in Washington, D.C.

  
\_\_\_\_\_  
Nicole M. Cleminshaw (VSB No. 92161)

**CERTIFICATE OF SERVICE**

I, Nicole Cleminshaw, hereby certify that on July 15, 2019, I electronically filed the foregoing Declaration of Nicole M. Cleminshaw in Support of the Parties' Joint Motion to Selectively Previously Filed Exhibits using the CM/ECF system, which shall send notification of such filing (NEF) to the following counsel of record:

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\_\_\_\_\_/s/  
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